

DECLARATION OF ASHISH BRAGANZA

Ashish Braganza hereby declares as follows:

1. I currently reside in Wake County, North Carolina. The statements contained in this Declaration are based upon my personal knowledge.

2. I am the Director, Global Business Intelligence at Lenovo Inc. ("Lenovo") and have been employed with Lenovo since November 2011.

3. In approximately March 2012, Lenovo entered into a business relationship with TMM Data, LLC ("TMM Data"). In my capacity as a Lenovo employee, I served as one of TMM Data's main points of contact with Lenovo. During the business relationship, I and other Lenovo employees were at times unhappy with TMM Data's work product and shared our assessments with one another and with TMM Data. As its business relationship with TMM Data became increasingly contentious, Lenovo ultimately decided to terminate the relationship in approximately July 2014.

4. I have reviewed a copy of the Complaint filed against me in the United States District Court for the Eastern District of North Carolina, captioned as TMM Data, LLC v. Ashish Braganza, No. 5:14-cv-00729. At no time have I engaged in any unlawful conduct towards TMM Data or its co-owners individually, including as specifically alleged in Paragraphs 15 and 17 of the Complaint. At no time did TMM Data or its agents contact me about the allegations in the Complaint before it was filed.

5. The Complaint makes reference to an individual named Joseph Prunty. I have never met or spoken to Mr. Prunty.

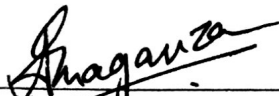
6. It is my understanding that Robert Selfridge, Plaintiff's co-owner, testified that I made unlawful comments about TMM Data to Comcast employee Joseph Sanders. This

testimony is false. I have never made unlawful comments about TMM Data to Mr. Sanders or any Comcast employee.

7. In approximately late October 2014, I had to have discussions with my supervisor and Lenovo's in-house legal counsel about the Complaint's allegations.

8. As a result of TMM Data's actions and its refusal to dismiss the Complaint between October 2014 and November 2015, my spouse and I have suffered unnecessary and substantial distress and other damages. I also believe that my latest performance review at Lenovo may have been impacted by TMM Data's actions against me.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



Ashish Braganza
12/17/2015

Date